

LONGVIEW FIBRE COMPANY

Longview Fibre Company is appreciative of the opportunity to provide comments on the proposed NPDES Industrial Stormwater General Permit, dated March 29, 2002. Longview Fibre Company is aware of the efforts by the Department of Ecology in revising earlier drafts based on the comments and concerns expressed by those participating in the negotiation settlement discussions. However, it appears that a significant amount of addition work is needed. In the interest of getting to a reasonable workable general permit we offer the comments contained in this letter.

We support the comments that we understand will be submitted by the Association of Washington Business (AWB) and the Northwest Pulp and Paper Association. They will be submitted under separate cover and, hopefully, will not be duplicated in this letter.

In addition, it is not clear in the draft permit how stormwater which was discharged into a man-made water conveyance, such as a ditch, would fit into Section S9.E.2 of the general permit. If it is meant to be in the "Other" category then it is very difficult to determine what the mixing zone would look like from the draft permit.

Compliance with the monitoring requirements in S4. will be very difficult and expensive because of the time frame, frequency and extensive testing required.

Section S7.B. appears to require compliance with water quality standards at the point of discharge for some instances where there is a discharge into a stormwater sewer system. This will be very difficult or impossible to comply with, and seems to be unnecessary since it is a sewer system.

Section S11 is too limited. For example, it does not appear to address the situation where the facility captures the stormwater and returns it for treatment with the process water. Section S11 should not be limited to only cases where the industrial activity has ceased.